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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

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| UNITED STATES OF AMERICA, Plaintiff, v. ALLISON MARIE BAVER, Defendant. | MOTION TO CONTINUE SENTENCING Case No. 2:21-cr-00520 Honorable Judge Jill Parrish |
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Defendant Allison Marie Baver (“Ms. Baver”), by and through counsel, Kristen R. Angelos and Robert K. Hunt, moves this Court for an order continuing the sentencing hearing set for April 10, 2024, at 11:00 a.m., for a period of 150 days from mid-February or a continuance of the hearing for 90 days past the currently set date. In support, Ms. Baver states the following:

1. Although Ms. Baver has already started a neuropsychological assessment, records continue to be requested and collected in order for the assessment to be complete. It’s anticipated that our records requests will take an additional 30 days from today’s date.

2. Once the records have arrived, our expert will need an additional 60 days to complete the assessment and provide findings.

3. Our social worker, who has been working with Ms. Baver to complete a life history, will need an additional 30 days after the draft is completed to summarize and synthesize everything.

4. Upon receipt of the expert's and social worker's reports, undersigned counsel will need an additional 30 days to prepare a sentencing memorandum summarizing the same. Counsel believes a sentencing memorandum and the associated reports will aid and assist the Court in determining sentencing in this matter.

For the foregoing reasons, Ms. Baver respectfully requests a continuance of the currently scheduled sentencing hearing set for April 10, 2024. The Government does not oppose the continuance. Any reports will be provided to the Government as they are completed. A proposed Order is submitted with this Motion.

DATED this 29th day of February, 2024.

/s/ Kristen R. Angelos
KRISTEN R. ANGELOS
Assistant Federal Defender

/s/ Robert K. Hunt
ROBERT K. HUNT
Assistant Federal Defender